

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the instructions contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (See INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Icarus Harmon

## DEFENDANTS

Syndicated Office Systems d/b/a Central Financial Control  
X, Y, Z Corporations(b) County of Residence of First Listed Plaintiff Montgomery County, PA  
(EXCEPT IN U.S. PLAINTIFF CASES)County of Residence of First Listed Defendant Dallas County, TX

NOTE:

(IN U.S. PLAINTIFF CASES ONLY)  
IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Vicki Piontek, Esquire  
Piontek Law Office  
951 Allentown Road  
Lansdale, PA 19446  
877-737-8617

Attorneys (If Known)

Mark A. DiAntonio, Esquire  
McCann & Geschke, P.C.  
1800 John F. Kennedy Blvd., Suite 801  
Philadelphia, PA 19103  
251-568-1133

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
Fair Debt Collection Practices Act 15 U.S.C. Sec. 1962Brief description of cause:  
Alleged violation of FDCPA

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ 13,101

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

MAY - 9 2014

DATE  
05/09/2014SIGNATURE OF ATTORNEY OF RECORD  
Mark A. DiAntonio

## FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

S.P.

**CMR****UNITED STATES DISTRICT COURT**

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 951 Allentown Road, Lansdale, PA 19446**14 2705**Address of Defendant: 1400 S. Douglas Road, Anaheim, CA 92806Place of Accident, Incident or Transaction: Philadelphia, PA

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☒ No ☐

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

## A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases  
(Please specify) Fair Debt Collection Practices Act

## B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases

(Please specify) \_\_\_\_\_

**ARBITRATION CERTIFICATION**

(Check Appropriate Category)

I, \_\_\_\_\_, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: \_\_\_\_\_

Attorney-at-Law

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

Attorney I.D.#

**MAY - 9 2014**

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: May 9, 2014Mark A. DiAntonio

Attorney-at-Law

81115

Attorney I.D.#

**CMR****IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA****CASE MANAGEMENT TRACK DESIGNATION FORM**

Icarius Harmon :

CIVIL ACTION

v. :

Syndicated Office System, :  
d/b/a Central Finance Control  
and X, Y, Z CorporationsNO. **22 2705**

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (x)

May 9, 2014

Date

Mark A. DiAntonio

Attorney-at-law

Syndicated Office Systems

Attorney for

215-568-1133

Telephone

215-568-1392

FAX Number

diantonio@doclawyers.com

E-Mail Address

(Civ. 660) 10/02

**MAY - 9 2014**



**McCANN &  
GESCHKE**

ATTORNEYS AT LAW a Professional Corporation

**CMR**

Mark A. DiAntonio  
[diantonio@doclawyers.com](mailto:diantonio@doclawyers.com)  
215-609-1563

May 9, 2014

14 2706

**VIA HAND DELIVERY**

U.S. District Court for the Eastern District of Pennsylvania  
Clerk of the Court  
601 Market Street  
Philadelphia, PA 19106

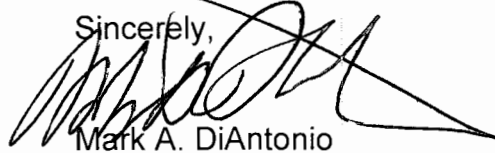
**Re: Icarus Harmon v. Syndicated Office Systems d/b/a Central Financial Control  
Notice of Removal**

Dear Clerk of the Court:

Enclosed please find a Notice of Removal, Civil Cover Sheet, Case Management Track Designation Form, a Designation Form, and a Certificate of Service. Also enclosed is the filing fee in the form of a check for \$400.00 made payable to the Clerk of the Court, USDC ED PA.

I request that you please file the Notice of Removal and attached documents. Please feel free to contact me if you have any questions.

Sincerely,



Mark A. DiAntonio

Enclosure  
255-007

**MAY - 9 2014**



14400  
**CMR**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

ICARUS HARMON

Plaintiff,

v.

SYNDICATED OFFICE SYSTEMS  
d/b/a Central Finance Control, and  
X, Y, Z CORPORATIONS

Defendants

Civil No. 14 2795

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 1446, Defendant, Syndicated Office Systems d/b/a Central Finance Control, hereby gives notice of removal of this action from the Court of Common Pleas of Montgomery County, in the Commonwealth of Pennsylvania, where this action was commenced, to the United States District Court for the Eastern District of Pennsylvania, the district embracing the place where the case is pending. In support of this Notice of Removal, Defendant states the following:

**TIMELINESS AND CONSENT**

1. An action was commenced in the Court of Common Pleas of Montgomery County, in the Commonwealth of Pennsylvania, captioned *Icarus Harmon v. Syndicated Office Systems d/b/a Central Finance Control, et al.*, Case ID. No. 2012-06490 (the "state court action").

2. Copies of all process, pleadings and orders sent to Defendants by Plaintiff in the state court action are attached hereto as Exhibit "A". Additional documents printed from the docket in the state court action are attached as Exhibit "B". The docket report in the state court action is attached as Exhibit "C".
3. Syndicated Office Systems d/b/a Central Finance Control received a copy of the Complaint and exhibits thereto via certified mail on April 21, 2014.
4. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is timely because it was effected within thirty (30) days of receipt of the Complaint.
5. In the Complaint, plaintiff asserts claims under the Fair Debt Collection Practices Act (FDCPA), U.S.C. § 1692 *et seq.*

#### **FEDERAL QUESTION JURISDICTION**

6. 28 U.S.C. § 1441(a) provides that "any civil action brought in a State Court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending."
7. This Court's subject matter jurisdiction, and the basis for removal, is founded upon 28 U.S.C. §§ 1331 and 1367.

8. Pursuant to 28 U.S.C. § 1331, this Court has original federal question jurisdiction over Plaintiff's FDCPA claim because that claim is based on a federal statute.
9. For these reasons, removal of the state court action is appropriate.

**OTHER PREREQUISITES FOR REMOVAL HAVE BEEN SATISFIED**

10. Venue is proper in the District pursuant to 28 U.S.C. § 1446 because the Montgomery County Court of Common Pleas, in the Commonwealth of Pennsylvania, where this action was filed and has been pending prior to removal, is a state court within this federal district and division.
11. Syndicated Office Systems d/b/a Central Finance Control will promptly file written notice of removal of this action together with a copy of this Notice of Removal with the Clerk of the Court in the Montgomery Court of Common Pleas, in the Commonwealth of Pennsylvania, in accordance with 28 U.S.C. § 1446(d) and serve it on Plaintiff's counsel.
12. A completed Federal Civil Cover Sheet accompanies this Notice of Removal.
13. If any question arises as to the propriety of the removal of this action, Syndicated Office Systems d/b/a Central Finance Control requests the opportunity to file additional support for this Notice of Removal by way of affidavits, deposition testimony, expert

testimony, discovery responses, supplemental memoranda, and legal argument.

WHEREFORE, Defendant, Syndicated Office Systems d/b/a Central Finance Control, hereby removes this action from the Court of Common Pleas of Montgomery County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania and that this Court assume jurisdiction of this action and issue such further orders and processes as may be necessary to bring it before all parties at trial.

Dated: May 9, 2014

/s/ Mark A. DiAntonio  
Mark A. DiAntonio, Esquire  
Attorney ID Number 81115  
1800 John F. Kennedy Boulevard  
Suite 801  
Philadelphia, PA 19103  
Phone: (215) 568-1133  
Facsimile: (215) 568-1392  
diantonio@doclawyers.com  
Attorney for Defendant,  
Syndicated Office Systems  
d/b/a Central Financial Control



# EXHIBIT A

ICARUS HARMON

vs.

SYNDICATED OFFICE SYSTEMS

NO. 2012-06490

**NOTICE TO DEFEND - CIVIL**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYER REFERENCE SERVICE  
MONTGOMERY BAR ASSOCIATION  
100 West Airy Street (REAR)  
NORRISTOWN, PA 19404-0268

(610) 279-9660, EXTENSION 201

IN THE COURT OF COMMON PLEAS  
OF MONTGOMERY COUNTY, PENNSYLVANIA

Icarus Harmon  
c/o Piontek Law Office  
951 Allentown Road  
Lansdale, PA 19446,  
v.

Plaintiff

SYNDICATED OFFICE SYSTEMS  
d/b/a Central Finance Control  
1445 ROSS AVE., STE 1400  
DALLAS, TX 75202

and

SYNDICATED OFFICE SYSTEMS  
d/b/a Central Finance Control  
1400 South Douglas Road  
Anaheim, CA 92806

and

SYNDICATED OFFICE SYSTEMS  
d/b/a Central Finance Control  
3220 Mckelvey Road  
Hazelwood, MO 63044

and

X,Y,Z Corporations

Defendant(s)

2012-06490

**COMPLAINT**

1. This is an action for damages brought by an individual consumer for Defendant's violations of the Fair Debt Collection Practices Act, 15 U.S.C. 1692, et seq. (hereinafter "FDCPA"). The aforementioned statute prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.
2. Jurisdiction and Venue is proper in this jurisdiction because a substantial portion of the acts, omissions, transactions or occurrences took place in this jurisdiction.
3. Jurisdiction and venue is proper in this jurisdiction because the Defendant(s) transact business here and the conduct complained of occurred here.
4. Plaintiff resides in this jurisdiction.

5. Icarus Harmon, an adult individual with a mailing address including but not limited to c/o Piontek Law Office, 951 Allentown Road, Lansdale, PA 19446.
6. Defendants are the following.
  - a. SYNDICATED OFFICE SYSTEMS, d/b/a Central Finance Control, a business entity with an address including but not limited to 1445 ROSS AVE., STE 1400, DALLAS, TX 75202.
  - b. SYNDICATED OFFICE SYSTEMS d/b/a Central Finance Control, a business entity with an address including but not limited to 1400 South Douglas Road, Anaheim, CA 92806
  - c. SYNDICATED OFFICE SYSTEMS d/b/a Central Finance Control, a business entity with an address including but not limited to 3220 Mckelvey Road, Hazelwood, MO 63044.
  - d. X, Y, Z Corporations, business entities whose identities are not know to Plaintiff at this time, but which will become known upon proper discovery. It is believed and averred that such Does played a substantial role in the commission of the acts described in this complaint.

**COUNT ONE: Violation of Fair Debt Collection Practices Act  
(FDCPA) 15 USC 1692 et. seq.**

7. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.
8. Plaintiff is a consumer debtor as defined by the FDCPA.
9. Defendant is a debt collector as defined by the FDCPA.
10. Defendants is a debt collector as defined by the FDCPA.
11. At all times mentioned herein, Defendant was attempting to collect on a certain consumer debts from Plaintiff.
12. On or about March 13, 2014, Defendant(s) engaged in a telephone conversation with Plaintiff.
13. The subject of the telephone conversation was certain account which Defendant claimed that Plaintiff originally owed to Hahnemann University Hospital.
14. The alleged Hahnemann University Hospital account that was the subject of the conversation was a consumer accounts for purposes of the FDCPA, 15 USC 1692 et. seq.
15. The alleged account would have been used primarily for Plaintiff's personal use.
16. Defendant's agent, employee or representative spoke to Plaintiff on the phone.



17. During such conversation, Defendant's agent, employee or representative made the following materially false, misleading, deceptive and unconscionable statements and / or implications.

- a. That the accounts would continue to be reported to a credit reporting agency(ies) for 7 years from the date that Defendant first started reporting the account to the credit reporting agency(ies), even though the account was alleged delinquent for about a year or more when the account was first reported by Defendant(s).
- b. That the 7 year limit on consumer reporting pursuant to the Fair Credit Reporting Act, 15 USC 1681 et. seq. starts as of the date that Defendant(s) first reports the account, and not from the date of original delinquency for the account.

18. Defendant(s)' false, misleading statements and / or implications were designed to harass and intimidate Plaintiff.

19. Defendant(s)' false, misleading statements and / or implications were designed to extract payment from Plaintiff.

20. Defendant(s)' false, misleading statements and / or implications were  
unconscionable.
21. Defendant(s)' false, misleading statements and / or implications violated 15 USC  
1692e and 15 USC 1692 e and 15 USC 1692 e of the FDCPA.
22. Defendant(s) statements were intended to harass, intimidate, confuse and deceive  
Plaintiff.
23. Defendant violated 15 USC 1692(e) by making materially false statements to Plaintiff.
24. Defendant(s) violated 15 USC 1692(f) by engaging in illegal and unconscionable debt  
collection practices.
25. In the alternative, if Plaintiff's statements were not false or misleading, and Defendant  
did intend to report the derogatory information about the consumer accounts on  
Plaintiff's consumer report for 7 years from the date that Defendant(s) first began to  
report the accounts, then Defendant would have been engaged in illegal and  
unconscionable collection activity in violation of 15 USC 1692 g et. seq.

## DAMAGES

26. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.
27. Plaintiff demands \$1.00 actual damages at least for phone, fax, lost time, etc.
28. Plaintiff demands \$1,000.00 statutory damages under the FDCA 15 USC 1692k.
29. Plaintiff suffered some emotional distress, anger and frustration as a result of Plaintiff's rights being violated by Defendant. Plaintiff was distressed and angered by the fact that Defendant was engaged in a law-breaking, profit-making enterprise at the expense of Plaintiff and other helpless consumers. The amount of such distress shall be determined at trial.
30. For purposes of a default judgment, Plaintiff believes and avers that the value of such distress is no less than \$10,000.00.

### ATTORNEY FEES

31. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.

32. Plaintiff believes and avers that Plaintiff is entitled to reasonable attorney fees for prosecuting this action.

33. Plaintiff believes and avers that such reasonable attorney fees amount to no less than \$2,100.00 at a rate of \$350.00 per hour. Services include but not limited to the following.

- |    |  |   |
|----|--|---|
| a. | Consultation with client, review of file and review of recording                 | 2 |
| b. | Drafting, editing, review, filing and service of complaint and related documents | 2 |
| c. | Follow up with Defense   | 2 |

---

6 x \$350 per hour = \$2,100

34. The above stated attorney include time spent plus reasonable follow up.

35. Plaintiff's attorney fees continue to accrue as the case move forward.

**OTHER RELIEF**

36. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.

37. Plaintiff seeks such other relief as this honorable Court may deem just and proper.

38. Plaintiff demands all fees and costs associated with prosecuting this action.

39. Plaintiff specifically requests / demands a jury trial in this matter.



Wherefore, plaintiff demands judgment against defendant in the amount of \$13,101.00.

(actual damages, statutory damages, emotional distress and attorney fees). Plaintiff also seeks damages for emotional distress, and such other relief as this Honorable Court may deem appropriate.

Vicki Piontek

Vicki Piontek, Esquire  
Attorney for Plaintiff  
951 Allentown Road  
Lansdale, PA 19446  
877-737-8617  
Fax: 866-408-6735  
palaw@justice.com

4/7/2014  
Date

IN THE COURT OF COMMON PLEAS  
OF MONTGOMERY COUNTY, PENNSYLVANIA

Icarus Harmon  
c/o Piontek Law Office  
951 Allentown Road  
Lansdale, PA 19446,  
v.

Plaintiff

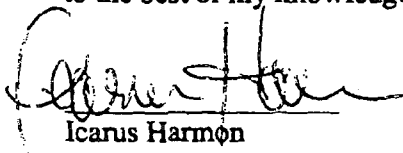
SYNDICATED OFFICE SYSTEMS  
d/b/a Central Finance Control  
1445 ROSS AVE., STE 1400  
DALLAS, TX 75202  
and  
SYNDICATED OFFICE SYSTEMS  
d/b/a Central Finance Control  
1400 South Douglas Road  
Anaheim, CA 92806  
and  
SYNDICATED OFFICE SYSTEMS  
d/b/a Central Finance Control  
3220 Mckelvey Road  
Hazelwood, MO 63044  
and  
X,Y,Z Corporations

Defendant(s)

2012-06490

VERIFICATION

I, Icarus Harmon, have read the attached Complaint. The facts stated therein are true and correct to the best of my knowledge, understanding and belief.

  
Icarus Harmon  
Date 4/6/14

# EXHIBIT B

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

ICARUS HARMON

vs.

SYNDICATED OFFICE SYSTEMS

NO. 2012-06490

PRAECIPE FOR APPEARANCE

TO THE PROTHONOTARY:

Please enter my appearance for

SYNDICATED OFFICE SYSTEMS

in the above case.

Date: 05/09/2014

ORIGINAL SIGNATURE RETAINED BY THE FILING PARTY

Signature

MARK A. DIANTONIO

Filing Party

81115

ID Number

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**CERTIFICATE OF SERVICE**

I, Mark A. DiAntonio, attorney for Defendant, Syndicated Office Systems d/b/a Central Finance Control, certify that a true and correct copy of the attached Notice of Removal was served upon the parties below by first class U.S. mail, postage pre-paid, on May 9, 2014:

Vicki Piontek, Esquire  
Piontek Law Office  
951 Allentown Road  
Lansdale, PA 19446  
Attorney for Plaintiff

McCann & Geschke, P.C.

By:

\_\_\_\_\_  
Mark A. DiAntonio, Esquire  
Attorney ID Number 81115  
1800 John F. Kennedy Boulevard  
Suite 801  
Philadelphia, PA 19103  
Phone: (215) 568-1133  
Facsimile: (215)568-1392  
[diantonio@doclawyers.com](mailto:diantonio@doclawyers.com)  
Attorney for Defendant,  
Syndicated Office Systems  
d/b/a Central Financial Control



# EXHIBIT C

[Back to Search](#) > Case #2012-06490**Case Details**

Case Number	2012-06490
Commencement Date	3/15/2012
Case Type	Summons Civil Action
PFA Number	
Caption Plaintiff	HARMON, ICARUS
Caption Defendant	SYNDICATED OFFICE SYSTEMS
Lis Pendens Indicator	No
Status	2 - OPEN
Judge	DANIELE
Remarks	
Sealed	No
Interpreter Needed	

Docket Date Range: **Docket Entries** ▼**Plaintiffs**

Name	Address	Country	Counsel	Notify	Sequence
HARMON, ICARUS	951 ALLENTOWN ROAD LANSDALE, PA 19446 UNITED STATES	UNITED STATES	PIONTEK, VICKI	Yes	1

**Defendants**


Name	Address	Country	Counsel	Notify	Sequence
SYNDICATED OFFICE SYSTEMS	1445 ROSS AVE STE 1400 DALLAS, TX 75202 UNITED STATES	UNITED STATES	DIANTONIO, MARK	Yes	1
CENTRAL FINANCE CONTROL	1400 SOUTH DOUGLAS ROAD ANAHEIM, CA 92806 UNITED STATES	UNITED STATES		Yes	2
CENTRAL FINANCE CONTROL	1445 ROSS AVE STE 1400 DALLAS, TX 75202 UNITED STATES	UNITED STATES		Yes	3
CENTRAL FINANCE CONTROL	3220 MCKELVEY ROAD HAZELWOOD, MO 63044 UNITED STATES	UNITED STATES		Yes	4
SYNDICATED OFFICE SYSTEMS	3220 MCKELVEY ROAD HAZELWOOD, MO 63044 UNITED STATES	UNITED STATES	DIANTONIO, MARK	Yes	5
SYNDICATED OFFICE SYSTEMS	1400 SOUTH DOUGLAS ROAD ANAHEIM, CA 92806 UNITED STATES	UNITED STATES	DIANTONIO, MARK	Yes	6

**Garnishees****Other Party Types****Docket Entries**

Seq.	Filing Date	Docket Type	Docket Text	Sealed	Filing ID
0	3/15/2012	Summons Civil Action		No	8782881
1	3/15/2012	Attorney To Proceed In Forma Pauperis		No	8782882
2	E 4/9/2014	Complaint In		No	9741118
3	E 5/9/2014	Entry of Appearance	OF MARK A. DIANTONIO FOR SYNDICATED OFFICE SYSTEMS	No	9783765

 **Parcel Numbers**

 **Archive Locations**

 **Linked Cases**

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Vicki Piontek, Esquire  
Piontek Law Office  
951 Allentown Road  
Lansdale, PA 19446  
Attorney for Plaintiff

McCann & Geschke, P.C.

By: /s/ Mark A. DiAntonio  
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